

# Exhibit 20D



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CNMI SUPERIOR COURT  
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Rosie Ada

A handwritten signature, possibly "Jen", is written in the upper right area of the page, overlapping the court's header information.

IN THE SUPERIOR COURT  
OF THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLAND

JOAQUIN Q. ATALIG, )  
)  
Plaintiff, )  
)  
vs. ) Civil Case No. 06-0119(R)  
)  
OKP (CNMI) CORPORATION, )  
BRIAN M. CHEN, PRASADA REDDY )  
GOLUGURI, PRAMUAN )  
JAIPHAKDEE, WILAI PROMCHAI, )  
COMMONWEALTH PORTS )  
AUTHORITY, and REGINO M. CELIS, )  
in his capacity as Acting )  
Executive Banes Director of the )  
Commonwealth Ports Authority, )  
and DOES 1-3, )  
)  
Defendants. )

DEPOSITION OF PRASADA REDDY GOLUGURI  
Friday, August 31, 2007

Western Deposition & Transcription, LLC  
1400 16th Street, Suite 400  
Denver, CO 80202 USA  
303.292.9400

1 that conversation with her? What's the date?

2 A It is on 22nd or 23rd of December.

3 Q Did you have more than one conversation with her  
4 about clearing the property?

5 A No, I remember only one time conversation.

6 Q Okay. And that's the conversation that was on  
7 the 22nd or 23rd of December; is that right?

8 A Yes, sir.

9 Q And that's before the property was cleared; is  
10 that right?

11 A Yes, sir.

12 Q Okay. Tell me about that conversation. What  
13 happened?

14 A I told her that we are going to clear some of the  
15 area for a recreation and a (indiscernible) parking  
16 area. So I ask her which area is permissible to clear  
17 and what is the boundary where we can leave.

18 Q All right. And when you had had that  
19 conversation with her, when you first started that  
20 conversation, where were you at?

21 A At the Sunrise Hotel.

22 Q And then she was also in the Sunrise Hotel?

23 A Yes, sir.

24 Q Which room were the two of you in?

25 A It's not a room, sir. Just outside the

1 the area to clear would be?

2 A Yeah. Jaiphakdee is the one used the backhoe,  
3 and he did mark out.

4 Q The whole square? He marked out the whole  
5 square; is that correct?

6 A Yes, sir.

7 Q And when he marked out the whole square, describe  
8 to me -- First of all, how did he do it?

9 A Because before that Allen Yee already told me  
10 that we are going to clear this area 150 by 100. And  
11 according to that, I just marked -- used a roller and  
12 marked the (indiscernible). After that, he took the  
13 backhoe and started from here. But I was not there. I  
14 left from (indiscernible).

15 Q All right. I'm going to get a marker. I'll have  
16 you draw on the exhibit. Okay. Giving the witness a  
17 marker; and on Exhibit 8, can you mark where you used a  
18 roller to mark out the area where to clear.

19 A Yeah. I just start from here, just all the way  
20 until here, 150 feet. I just take the roller to the  
21 point. Then he marked himself. Just say okay.

22 Q Okay. So when you say you took the roller,  
23 explain to me what is a roller.

24 A It is a measuring roller that is a roller  
25 (indiscernible) and that has one wheel and

1 (indiscernible).

2 Q Okay. Can you draw a line then, across Exhibit 8  
3 with a green pen, of where you marked on the property  
4 with the roller 150 feet.

5 A I just measure in two directions only.

6 Q Okay.

7 A I just measured from here to here. I told him  
8 150 feet here. And after that, I measure from here to  
9 here. I told him this is the area we want to clear.  
10 Then he marked himself.

11 Q Okay. Let me borrow the exhibit back from you  
12 real quick. Okay. I'm going to just label this so that  
13 it'll be clear later, when we're looking at the exhibit.  
14 I'm going to draw a little line. I'll put a number 1.  
15 And this line here that I've marked as number 1, is that  
16 the measurement you made of the 150 feet?

17 A Yes, sir.

18 Q Okay. I'm going to draw another little line.  
19 Marked it with a number 2. Is that -- And it's touching  
20 this green line. Is that the line that you marked out  
21 100 feet?

22 A Yes, sir.

23 MR. FRINK: Object as vague.

24 Q All right. Now, after you did that, am I  
25 correct, Mr. Jaiphakdee, did he then scrape the ground

1 and mark out the box of the area that would be cleared?

2 A Yes, sir.

3 Q Okay. Can you, with the green marker again, draw  
4 what Mr. -- Well, actually, let me ask you this. The  
5 dark line -- The dark box that's on Exhibit 8, would that  
6 be the area that Mr. Jaiphakdee scraped out? Would he  
7 have followed within that dark line?

8 MR. FRINK: Objection, calls for a conclusion  
9 from an exhibit he hasn't identified.

10 A I cannot remember exactly this (indiscernible),  
11 sir.

12 Q Okay.

13 A I can remember only these two measurements I  
14 made, and I told him them.

15 Q All right. All right. Did you see the scraping  
16 work that he did after it was completed?

17 MR. FRINK: Objection, vague.

18 A After the scraping completed, everything I saw.

19 Q Okay. If I write first Mr. Jaiphakdee scraped  
20 out the boundary where the area to clear; is that  
21 correct?

22 A Yes, sir.

23 Q And then, after that, the area was cleared; is  
24 that correct?

25 A Yes, sir.

1 A Allen Yee is the one give me the instruction to.

2 Q Allen Yee gave you the instruction to go ahead?

3 A To go ahead.

4 Q And then you told Jaiphakdee --

5 A Go ahead and clear, and that's it.

6 Q -- go ahead. And then the property was cleared.

7 A Yes, sir.

8 Q So no further instructions were given.

9 A No.

10 Q Okay. All right. Why don't we mark on that  
11 map. You can use the green pen again. Where was it --  
12 First off, mark where -- on the -- near the Sunrise  
13 building, if this is correct, where you first met Adita  
14 Carrillo. Just put a dot.

15 A You mean the first I had met her?

16 Q When you went up to her and said whatever it was  
17 that you said.

18 A Somewhere here.

19 Q I'm going to draw a little line and make a  
20 number. I've drawn a red line to the dot that you made,  
21 labeled the dot.

22 A I had met her -- I saw her there, and I --

23 Q Okay. I'm just making it clear for the record.  
24 Number 3 is where you first met Adita Carrillo; is that  
25 right?

1 They're easier to read. Proposed seal tank, standby  
2 generator and materials store. And then there's a site  
3 access to the left.

4 A Yes, sir.

5 Q Is this roughly how the area behind the Sunrise  
6 Hotel was developed by OKP?

7 A Yes, sir.

8 Q I note on this that the measurements for the  
9 depth, it says 150 feet.

10 A Yes, sir.

11 Q But for the length, it looks like it says 214  
12 feet.

13 A Yes, sir.

14 Q Do you know how long the area that was actually  
15 created was?

16 MR. FRINK: Objection, vague.

17 A Actually cleared was how long (indiscernible) of  
18 that.

19 Q Okay. How long did you instruct that the area be  
20 that was cleared?

21 A I instructed the worker based on Allen Yee's  
22 instructions to me.

23 Q Yeah. How many feet?

24 A 150 feet by 100 feet.

25 Q And this Exhibit 25 shows 150 by 214; is that



1 CERTIFICATE

2 I hereby certify that the foregoing is a true and correct  
3 transcript from the record of proceedings in the  
4 above-entitled matter.

5

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11 \_\_\_\_\_ September 20, 2007

12 Judy M. Fugate

13 Western Deposition & Transcription, LLC

14 1400 16th Street, Suite 400

15 Denver, CO 80202 USA

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## REVISIONS TO DEPOSITION

NAME OF DEPONENT: PRASADA REDDY GOLUGURI

CASE NO. : CIVIL CASE NO. 06-0119(R)

DATE OF DEPOSITION: AUGUST 31, 2007

PAGE NO. / LINE NO.	READS	SHOULD READ	REASON THEREFORE
41 / 17	are priority. My role is (indiscernible). I just help	are priority. My role is until that. I just help	Inaccurate Transcription
42 / 4	which worker this work is to be (indiscernible).	which worker this work is to be entrusted.	Inaccurate Transcription
44 / 15	area for a recreation and a (indiscernible) parking	area for a recreation and a vehicle and equipment parking	Inaccurate Transcription
46 / 5	area and what is the boundary (indiscernible).	area and what is the boundary check with her and check with her.	Inaccurate Transcription
46 / 13	(indiscernible) since she was working at Sunrise.	still working with she was working at Sunrise.	Inaccurate Transcription
46 / 16	A (Indiscernible) told that -- (Indiscernible) told	A What he told that -- what he told	Inaccurate Transcription
46 / 22	the context (indiscernible). I do not know	the contract still not end or what. I do not know	Inaccurate Transcription
46 / 23	(indiscernible).	exactly.	Inaccurate Transcription
47 / 9	you so we are going to clear some of the area for making	you so we are going to clear some of the area for vehicle	Inaccurate Transcription
47 / 13	clearing. Showed me.	clearing. Shortly.	Inaccurate Transcription
48 / 4	(indiscernible), she showed me until the boundary this	finger out, she showed me until the boundary this	Inaccurate Transcription
48 / 6	the workshop shed where we (indiscernible), and again she	the workshop shed where we constructed, and again she	Inaccurate Transcription
48 / 7	(indiscernible) the finger to the boundary. So this is	show me the finger to the boundary. So this is	Inaccurate Transcription
48 / 12	need only -- (indiscernible) Allen Yee told me that we	need only -- according to Allen Yee told me that we	Inaccurate Transcription

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48 / 22	be careful, there is a hole. (Indiscernible) fell into	be careful, there is a hole. There you may fell into	Inaccurate Transcription
48 / 23	that hole. (Indiscernible) I could see all the grass	that hole. But that place I could see all the grass	Inaccurate Transcription
48 / 25	(indiscernable).	Thats all.	Inaccurate Transcription
49 / 12	A I walked the property with her. All of this	A I walked the property with her.	Inaccurate Transcription
49 / 13	(indiscernible) one like this and there was one here.	Only this two spots one like this and there was on here.	Inaccurate Transcription
50 / 15	area (indiscernible) she said can be cleared.	area which you already ask for she said can be cleared.	Inaccurate Transcription
50 / 24	A Sir? (Indiscernable).	A Sir? Sorry say again.	Inaccurate Transcription
51 / 11	A Pramuan (indiscernible). It is 8, sir.	A Pramuan Jaiphakdee. It is 8, sir.	Inaccurate Transcription
52 / 1	take the measuring roller. (Indiscernible). I just	take the measuring roller. As per the instructions given by Mr. Yee. I just	Inaccurate Transcription
52 / 3	both (indiscernible) the measurement I show him. Then he	both directions the measurement I show him. Then he	Inaccurate Transcription
53 / 3	A Yes, sir. (Indiscernible).	A Yes, sir. This place containers.	Inaccurate Transcription
53 / 9	and the dedication, the area where we cleared.	and the recreation, the area where we cleared.	Inaccurate Transcription
54 / 12	marked the (indiscernible). After that, he took the	marked this side and this side I show him. After that, he took the	Inaccurate Transcription
54 / 14	left from (indiscernible).	left from that place.	Inaccurate Transcription

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54 / 21	point. Then he marked himself. Just say okay.	point. Then he marked himself. He say okay.	Inaccurate Transcription
54 / 24	A It is a measuring roller that is a roller	A It is a measuring ruler that is a ruler	Inaccurate Transcription
54 / 25	(indiscernible) and that has one wheel and	having we can extend that has one wheel and	Inaccurate Transcription
55 / 1	(indiscernible).	the reading show the measurement.	Inaccurate Transcription
56 / 10	A I cannot remember exactly this (indiscernible),	A I cannot remember exactly this line or not sir,	Inaccurate Transcription
57 / 12	A The clearing just running in between, sir.	A Few inches only may be two inches.	Inaccurate Transcription
57 / 17	A No, sir. I'm not that (indiscernible).	A No, sir. I'm not having any authority to give	Inaccurate Transcription
57 / 22	A (Indiscernible) can --	A Approval means the work can --	Inaccurate Transcription
59 / 21	me the hand the boundaries (indiscernible).	me the hand the boundaries somewhere there.	Inaccurate Transcription
59 / 24	(indiscernible) the boundaries (indiscernible)	pointed out towards the boundaries outside that.	Inaccurate Transcription
60 / 13	A Somewhere here. I'm not exactly familiar.	A Somewhere here. I can not exactly somewhere here.	Inaccurate Transcription
61 / 15	A No, sir. I remember that, from there, I just	A No, sir. I remember that, from there, I just disperse I just	Inaccurate Transcription
62 / 5	A Do you know what (unintelligible)?	A Do you know what please pardon sir?	Inaccurate Transcription
62 / 18	A (Indiscernible).	A Behind the workshop.	Inaccurate Transcription

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63 / 12	just put the (indiscernible) sheet, plastic sheet, after	just put the canvas sheet, plastic sheet, after	Inaccurate Transcription
64 / 2	A No, I (indiscernible).	A No, I am not the one. I do not know about this.	Inaccurate Transcription
64 / 22	A Sometimes (indiscernible) involved. Sometime	A Sometimes some people involved. Sometime	Inaccurate Transcription
65 / 24	A I saw the site plans on the extension.	A I saw the site plans of the runway extension work.	Inaccurate Transcription
66 / 11	OKP Corporation (indiscernible).	OKP Corporation here in CNMI.	Inaccurate Transcription
67 / 17	A Actually cleared was how long (indiscernible) of	A Actually cleared was how long I did not measure	Inaccurate Transcription
68 / 19	remember exactly (indiscernible).	remember exactly the shape.	Inaccurate Transcription
69 / 20	shed, sir.	shape, sir.	Inaccurate Transcription
69 / 23	A That what we call the workshop.	A That what we call it as workshop.	Inaccurate Transcription
70 / 8	A I (indiscernible) see before, sir.	A I did not see before, sir.	Inaccurate Transcription
70 / 21	A (Indiscernible) permit (indiscernible)?	A For any permit sir?	Inaccurate Transcription
72 / 12	A I haven't decided anything (indiscernible).	A I haven't decided anything until now.	Inaccurate Transcription
72 / 18	A I honestly haven't decide anything yet.	A I still haven't decide anything yet.	Inaccurate Transcription
73 / 6	(indiscernible).	can remember.	Inaccurate Transcription

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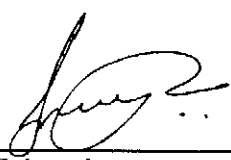
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PAGE NO. / LINE NO.	READS	SHOULD READ	REASON THEREFORE
92 / 16	A I -- I don't know of any other thing.	A I -- I did not involve in any other thing.	Inaccurate Transcription
92 / 25	(indiscernible). I told them that they (indiscernible).	play. I saw them that they are playing Thailand Boll.	Inaccurate Transcription
94 / 9	A Well, by the time I came to Sunrise, I saw that	A No, by the time I came to Sunrise, I saw that	Inaccurate Transcription
94 / 10	the flooring is still (indiscernible), the concrete	the flooring is still under construction, the concrete	Inaccurate Transcription
94 / 22	A No, sir, (indiscernible).	A No, sir, I did not see anything.	Inaccurate Transcription
94 / 25	constructed. (Indiscernible) you bring here and install	constructed. That thing is bring here and install	Inaccurate Transcription
95 / 12	A That time I have a -- Even though the local	A That time I have a -- Even now also the local	Inaccurate Transcription

## CERTIFICATE

I, Prasada Reddy Goluguri, the undersigned, declare that I have read the foregoing transcript of my deposition, and have made corrections, additions or deletions that I was desirous of making on the foregoing pages.

Executed this 25<sup>th</sup> day of October, 2007.

  
\_\_\_\_\_  
Prasada Reddy Goluguri